

## V. ALTERNATIVES

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CEQA requires an evaluation of the comparative merits of a range of reasonable alternatives to the project which could feasibly attain the basic objectives of the project [CEQA Guidelines Section 15126(d)]. The range of alternatives is governed by the "rule of reason" that requires an EIR to set forth only those alternatives necessary to permit a reasoned choice. An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative [CEQA Guidelines Section 15126(d)(5)].

Because this EIR analyzes four distinct projects in the body of the document, the alternatives analysis include only the No Project (as required by CEQA) and alternative Site E (originally submitted to the Town then withdrawn). The significant effects of the alternatives are discussed but in less detail than the significant effects of the project [CEQA Guidelines Section 15126(d)(4)].

### A. NO PROJECT ALTERNATIVE

#### DESCRIPTION

Under this alternative, the four identified sites would remain under present conditions. Therefore, any impacts projected under this alternative would be associated with the current uses. Current uses on the sites include a restaurant and club house on Site A, a flower cultivating operation on Site B, a former auto showroom building currently used for auto storage on Site C, and a former auto dealership currently used as a parking lot for nearby businesses on Site D.

#### IMPACTS

##### Land Use, Plans and Policies

Under the No Project Alternative, no improvements or changes would be made to existing site conditions. Each of the proposed project sites would remain open to future development. Site A, which currently is zoned for cemetery use, could be rezoned to commercial use as part of the Cypress Hills Business Park Master Plan. Use of Site B would likely remain for flower growing

purposes, although its current zoning classification for commercial use would permit future development. Sites C and D are both currently developed as auto sales centers.

#### Geology, Soils and Seismicity

Under the No Project alternative, much of the Site A property would remain unpaved and pervious. The soils might eventually become saturated and, without adequate drainage facilities, erode and cause siltation events downslope. Under the No Project alternative at Site B, the hillside would remain unexcavated and unpaved. Runoff would not increase significantly, but soils would remain exposed in places and the chance of a siltation event will be more likely than if the site were paved. The No Project alternative at Site C would have no significant effects. Under the No Project alternative at Site D, more pervious surface area would remain. Because that parcel is vegetated, and because Site D-1 is already paved, no significant effects would result from the No Project alternative. On the other hand, not constructing an employee parking lot on Site D-1 would allow a more natural drainage regime to continue to exist adjacent to Colma Creek, even though the creek itself runs in an artificial concrete channel past this site.

#### Hydrology and Water Quality

Under the No Project alternative at Site A, much of the property would likely remain unpaved and pervious. Groundwater recharge area would be maintained, and both ground and surface waters would be kept free from increased pollutants. However, the soils here may become saturated and, without adequate drainage facilities, erode and cause siltation events downslope. Under the No Project alternative at Site B, the hillside would remain unexcavated and unpaved. Groundwater recharge area would be maintained, and both ground and surface waters would be kept free from increased pollutants. Runoff would not increase substantially, but soils would remain exposed in places and the chance of a siltation event would be more likely than if the site were paved. Under the No Project alternative at Site C would have no significant effects. Under the No Project alternative at Site D, more pervious surface area would remain. Groundwater recharge area would be maintained, and both ground and surface waters would be kept free from increased pollutants. Not constructing an employee parking lot on Site D-1 would allow a more natural drainage regime to continue to exist adjacent to Colma Creek, even though the creek itself runs in an artificial concrete channel past this site.

### Biological Resources

Under the No Project alternative, none of the four sites would be subject to development impacts. On Sites D and D-1, where potential jurisdictional wetlands exist under the No Project Alternative, the area would remain undisturbed by further development. On site D-1, where there exists a tree mass recognized by the Town of Colma and that could sustain raptor habitat, the site would remain undeveloped under this alternative.

### Visual Quality

Under the No-Project Alternative, all sites would remain essentially unchanged in visual character. Site A would remain as a graded lot surrounding the golf course club house. The open, vegetative state of Site B would be preserved. Site C would retain its semi-industrial appearance with the massive car dealership building and expansive parking lot. Site D would remain partially developed with rectilinear car dealership structures to the northeast, and open sloping land to the southwest. Site D-1 would remain undeveloped, enhanced by the intimate wooded visual character of mature trees.

### Housing

Currently, Colma lacks housing to support jobs held in the Town. This jobs/housing imbalance results in a net in-commute of people to Colma for employment. Under the no-project alternative, Colma would be expected to have a jobs/housing balance of 2.3 in 1995 (ABAG, 1993).

### Recreation

Colma's existing recreational opportunities would remain. This includes use of the golf course and putting green adjacent to the Cypress Golf Course Clubhouse, San Bruno Mountain State and County Park, and limited use of school facilities located outside of Town limits.

### Cultural Resources

No previously unknown prehistoric and/or historic cultural resources could be discovered under this alternative.

Transportation, Circulation and Parking

Under the No-Project Alternative, no new vehicle trips associated with a cardroom in Colma would be added to traffic volumes at the study intersections. Existing traffic volumes at those intersections, however, would increase because of other cumulative development projects in the area. Intersection operating conditions would be as described under Future Without Project conditions on page IV.I.20 and in Tables IV.I.7 and IV.I.8, pages IV.I.21 and IV.I.22 in the body of the EIR.

Air Quality

Under the No Project Alternative, none of the air quality impacts identified with the other proposed sites. Because no construction would take place, there would be no temporary air quality impacts related to fugitive dust. Operational air quality impacts identified with the proposed project would not occur under the No Project Alternative. Because no incremental traffic would occur under the No Project Alternative, there would be no air quality impacts associated with increased vehicle traffic on nearby roadways.

Noise

Under the No Project Alternative, none of the noise impacts identified with the other proposed sites. Because no construction would take place, there would be no temporary noise impacts related to construction equipment. Operational noise identified with the proposed project would not occur under the No Project Alternative. Because no incremental traffic would occur under the No Project Alternative, there would be no noise impacts associated with increased vehicle traffic on nearby roadways.

Energy

Under the No Project Alternative, none of the energy impacts identified with the other proposed sites would occur. Because no construction would take place, there would be no temporary noise impacts related to operation of construction equipment or the manufacture of project materials. Operational energy consumption identified with the proposed project would not occur under the No Project Alternative. Because no incremental traffic would occur under the No Project Alternative, there would be no energy impacts associated with increased vehicle trip generation.

### Public Services and Utilities

Under the No Project alternative, additional provisions of public services and utilities would not be required. Site A would remain as a club house and restaurant accompanying the adjacent golf course and would continue to draw upon police, fire and emergency medical service, refuse collection service, water provision service, power provision service, and sanitary sewer service. Site B would remain as an agricultural operation and would continue to draw upon police, fire and emergency medical service, refuse collection service and power provision service. Site C would remain as an auto storage building and parking lot and would continue to draw upon police, fire and possibly emergency medical service. Because Site C is presently covered by impervious surface, it would continue to divert storm water run-off to the Colma Creek stormwater sewer system, which is undersized for current peak wet weather conditions. This would be an adverse but not significant impact to that system. Site D would remain as an unused auto show room and parking lot and would continue to draw upon police and fire service. Because most of Site D is presently covered by impervious surface, it would continue to divert storm water run-off to the Colma Creek stormwater sewer system, which is undersized for current peak wet weather conditions. This would be an adverse but not significant impact to that system.

### **B. SITE "E" ALTERNATIVE**

#### DESCRIPTION

This Alternative would be constructed on an undeveloped 5.52-acre site on Mission Road. The Site E Alternative would include an approximately 61,156 sq. ft. building with a two-story casino and three-story parking garage. The site is partially in the City of South San Francisco. The proposed cardroom would include a piano bar, a restaurant, coffee shop, lounge, and roving food service. A total of 60 card tables would be included, and 780 parking spaces would be provided (715 required).

#### IMPACTS

### Land Use, Plans and Policies

Site E is an approximately 5.5 acre rectangular area zoned "C" Commercial and designated by the *General Plan* for commercial use. A portion of the site is located in South San Francisco.

The site is characterized by graded areas and dirt storage piles. Development consistent with the proposed site plan would result in a change in land use intensity. Although the change in intensity would not be an impact by itself, secondary effects related to transportation, safety and noise could result. The potential for land use incompatibilities also exists, due to the proximity of Jefferson High School.

#### Geology, Soils and Seismicity

Site E is located on the Colma Formation. Surface elevations at Site E range from 0 to 50 feet above mean sea level (msl). (Elevations may actually be lower than sea level, as excavation has occurred at this site in the past.) No landslides exist on this site; the nearest such feature, as mapped by Brabb & Pampeyman (1972B) is about one mile away to the northwest. Liquefaction susceptibility at this site is low to very low; but landslide susceptibility is low to moderate (Malcolm Carpenter Associates, 1993). No fault traces pass through this site, although it lies in close proximity to two inactive faults: the Hillside fault (6500 ft. to the north), and the San Bruno fault (500 ft. northeast). The active San Andreas fault is located 7800 ft. southwest. The epicenters of at least eight earthquakes with Richter magnitudes of between 1 and 2 have occurred within three miles of this site, as well as four earthquakes of magnitude 2 to 3, and one of magnitude 4 to 5 (Brabb & Olson, 1986).

The 5.52 acre site is currently a vacant lot, with a gentle to moderate slope towards the southwest. A site visit by ESA staff on September 8, 1993 revealed that an excavation, approximately 15 feet deep, has been made in the past at this site; and a large spoil pile has been created near the excavation. The site visit by ESA staff revealed that the topsoil consists of fine to very fine silty soil; some clay was also found in the excavation, along with many pebbles and some cobbles. The site is slightly lower than the adjacent road (Mission Road.).

This site would be subject to the impacts of ground shaking and ground failure. The design of the proposed building, constructed of stucco and clay tile roofs with a high tower, would not easily withstand the effects of seismic ground shaking.

#### Hydrology

The site is currently a vacant lot, with a gentle to moderate slope towards the southwest. A site visit by ESA staff on September 8, 1993 revealed that an excavation, approximately 15 feet deep,

has been made in the past at this site; and a large spoil pile has been created near the excavation. The site is slightly lower than the adjacent road (Mission Road).

### Biological Resources

This parcel contains two contiguous pieces of land, totaling approximately five-acres. The upper, eastern portion of the property is acting as a staging area for some construction and is very disturbed. Typical species found in this area are horseweed (*Conyza canadensis*), plantain, and wild geranium. The second parcel, on the western edge, is approximately 75 feet below the first parcel, and contains a depression down the middle that supports some plant species typical of wet meadows, such as curly dock (*Rumex crispus*), horsetail (*Equisetum* sp.), and blackberry bushes. All three species are wetland indicator species. Upland species such as coyote bush, and acacia were observed growing along the elevated areas and on the bank adjacent to the first parcel. Wildlife species observed in this lower area were mourning dove, and house finch, in the upland area, and a feral cat.

### Visual Quality

The overall form of the site is not distinctive and does not contribute to its scenic resource value. A large abandoned pit is located at the western end of the property, and stockpiles of dirt are located in the mid-section of the lot. No surface waterway exists on the project site. The project site is undeveloped and contains abandoned vehicles, stray litter and a trash dumpster in the southeastern portion of the lot. The land appears to have been used for uncontrolled fill. The project site is bordered by light industrial businesses to the southwest, El Camino High School to the east, Holy Cross Cemetery to the northeast, and two-story wooden Victorian homes to the northwest. Wild grasses and other ruderals cover the project site, including the excavation pit and some of the soil stockpile mounds. Due to the open expanse and lack of visual buffers on its northeastern boundary, the project area is readily visible from the adjacent Mission Road.

The Site E project would not result in substantial changes to *Site Location and Spatial Organization, Landform, and Surface Waters*. *Land Uses and Cultural Features* would be changed. The project would entail the construction of a two-story casino for 60 gaming tables and a three-story garage. The Spanish Mission style cardroom building would be located at the northwestern end of the rectangular lot, and would have a terra cotta roof, beige sand colored walls with light red trim. A hexagonal tower approximately 22 feet tall would be located at the eastern corner of the building, with the sign facing northeasterly onto Mission Road. The

entrance fountain court would be surrounded by arched colonnades. Southeast of the entrance court are the surface parking area and the parking garage, the former of which would cross over the Colma-South San Francisco city limits. Parking space for 780 vehicles would be provided, with 480 spaces in the garage for guests, 200 surface parking spaces for 200 guests, and 100 spaces below grade for employee parking. The vegetation pattern would be changed. Fifteen percent of the project site would be landscaped, with a setback of 10 feet.

The construction of the proposed cardroom on presently undeveloped land would introduce new sources of light and glare to the nearby cemetery and residential areas. This impact would be considered to be significant. Illumination of the cardroom and the adjacent parking lots, reflective surfaces, and headlights from vehicles entering and exiting the premises, would generate light and glare to the adjacent cemetery and residential areas. The project site would be landscaped within the parking areas and at the perimeters with trees, shrubs, and groundcovers that would visually light and glare impacts.

#### Housing

Development of the proposed cardroom on site E would introduce approximately 497 jobs to the Town of Colma and South San Francisco. Similar to sites A, B, C, and D, this project would continue to maintain a jobs/housing imbalance in Colma, by serving as a provider of jobs rather than housing. In 1995, it is expected that Colma's and South San Francisco's jobs / housing balance will be 2.3 and 1.6, respectively. With the proposed project, these imbalances could remain.

The additional 497 jobs created by the cardroom would be considered a beneficial impact to Colma and South San Francisco. Economic benefits related to employment levels and housing development would result.

#### Recreation

Site E is currently not used for recreation. Development of the proposed project would introduce a recreational opportunity not available in Colma. This would be a beneficial impact. Recreational aspects of the cardroom would include a piano bar, recorded music, a coffee shop, lounge and restaurant.



### Cultural Resources

This site is located on the alluvial stream terrace and would be considered to have the possibility for prehistoric cultural resources. The impact to unknown prehistoric cultural resources during construction activities at Site E would be the same as that described for Site C.

### Transportation, Circulation and Parking

The Site E cardroom proposal, with 60 gaming tables, would generate the same number of vehicle trips as project Site B and Site C, 50 percent more than project Site A, and 20 percent more than project Site D. Site E is situated partly in the alignment of the proposed Hickey Boulevard extension, planned by the City of South San Francisco, from El Camino Real to Hillside Boulevard (discussed on page IV.I.12). The effect of these trips on intersection levels of service in the study area would be similar to those associated with the alternate project sites, prior to completion of the Hickey Boulevard extension, because the core market area for cardroom patrons would be expected to be the northern San Francisco peninsula, the same as for the project proposals. If Hickey Boulevard were extended, the assumed trip distribution would be affected, as would the potential traffic impacts at study intersections. Trips to and from San Francisco would use the Hickey Boulevard interchange instead of the Serramonte Boulevard interchange, thus diverting the project impact from Study Intersection #10 (Serramonte / Junipero Serra) to Intersections #11, 12 and 13, each of which are projected to operate at level of service C/D or better under Future without Project (1995) conditions (see Tables IV.I.7 and IV.I.8, pages IV.I.21 and IV.I.22).

Site E would require 744 off-street parking spaces, based on 60 gaming tables, 497 employees, 280 total seats in the restaurant / coffee shop / lounge, and Development Standards established by the Town of Colma (see discussion on page IV.I.27). In the absence of a per-shift employee breakdown; the analysis assumes about 39 percent of total employees would be on the largest shift, the same assumption used for project Site C and Site D, explained in the footnote on page IV.I.30. The Site E proposal indicated that 780 on-site parking spaces would be provided. Although the site would lose some parking spaces to the Hickey Boulevard extension right-of-way, the parking supply would be expected to be adequate to serve the parking demand generated by operations of the Site E.

Air Quality

The Site E Alternative would result in construction, operational and vehicle related air quality impacts similar to those identified for the other project sites. However, Site E is not located near residences or other sensitive receptors and potential fugitive dust impacts during project construction would be less likely to cause a public disturbance under this alternative than the Site D proposal. The other site locations (A, B, and C) are not located near sensitive air quality receptors.

Noise

The Site E Alternative would result in construction, operational and vehicle related noise impacts similar to those identified for the other project sites. However, Site E is not located near residences, cemeteries or other sensitive noise receptors and potential noise impacts would be less likely to cause a public disturbance under this alternative.

Energy

The Site E Alternative would result in construction, operational and vehicle related energy consumption impacts similar to those identified for the other project sites, none of which are significant. Because the Site E Alternative proposes a 61,000-square-foot building, the operational energy consumption would be greater than that of the Site B, C and D proposals and less than the Site A proposal.

Public Services and Utilities

Site E is in close proximity to a public High School and a residential neighborhood and would present additional security problems to the Colma Police Department. In addition, the site is partially located in the City of South San Francisco, which creates an additional problem as to jurisdiction (affecting police, fire, and emergency medical responders, as well as sewer, water and garbage districts). An impact could arise from the division of the proposed project fees and tax revenue between the Cities, as that money is intended to pay for the City services extended to the project. Because the site is completely undeveloped, it would generate considerable amounts of storm water run-off upon development, adding to the currently over-burdened Colma Creek system.